



April 28, 2016

Via ECFS

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

RE: *Connect America Fund*, WC Docket No. 10-90

Dear Ms. Dortch:

The first phase of the USF Order released on March 30, 2016 is to allow companies that may elect to take Model-Based support to file challenges about competitive overlap identified by the FCC. The FCC obtained their information from the June 30, 2015 FCC Form 477 filings. These challenges along with the appropriate documentation need to be filed by April 28, 2016.

This challenge is for Lone Rock Co-op Tel, SAC 351228. The competitors identified in the ACAM model are: Fenton Coop Telephone Company, LTD Broadband LLC, River Valley Telephone Coop-Graettinger and River Valley Telephone Coop-Ruthven. The impacted census blocks, reasons for challenge and supporting evidence have been included with this filing.

Thank you for your attention to this correspondence. Pursuant to Section 1.1206 of the Commission's rules, a copy of this letter is being filed via ECFS.

Sincerely,
/s/ Burnie E. Snoddy

Burnie E. Snoddy
Senior Telecommunications Consultant

cc: Katie King, via email (Katie.King@fcc.gov)

FCC Docket 10-90

Competitive Overlap Challenge
Lone Rock Co-op Tel

Filing Entity Lone Rock Co-op Tel
SAC 351228

191099503003002 Iowa	River Valley Telephone Coop-Ruthven	Subsidized carrier
191099503003019 Iowa	River Valley Telephone Coop-Ruthven	Subsidized carrier
191099503003026 Iowa	River Valley Telephone Coop-Ruthven	Subsidized carrier
191099503003132 Iowa	River Valley Telephone Coop-Ruthven	Subsidized carrier
191099506002011 Iowa	River Valley Telephone Coop-Ruthven	Subsidized carrier
191099506002012 Iowa	River Valley Telephone Coop-Ruthven	Subsidized carrier
191099506002021 Iowa	River Valley Telephone Coop-Ruthven	Subsidized carrier
191099506002025 Iowa	River Valley Telephone Coop-Ruthven	Subsidized carrier
191099503003019 Iowa	Fenton Cooperative Telephone Company	Subsidized carrier
191099503003020 Iowa	Fenton Cooperative Telephone Company	Subsidized carrier
191099503003028 Iowa	Fenton Cooperative Telephone Company	Subsidized carrier
191099503003057 Iowa	Fenton Cooperative Telephone Company	Subsidized carrier
191099503003065 Iowa	Fenton Cooperative Telephone Company	Subsidized carrier
191099503003076 Iowa	Fenton Cooperative Telephone Company	Subsidized carrier
191099503003130 Iowa	Fenton Cooperative Telephone Company	Subsidized carrier
191099503003139 Iowa	Fenton Cooperative Telephone Company	Subsidized carrier
191099506002032 Iowa	Fenton Cooperative Telephone Company	Subsidized carrier

Lone Rock Co-op Tel
351228

Screen shot of LTD Broadband website; No voice plans currently offered.

The screenshot shows the LTD Broadband website. At the top, there's a header with the company logo (a Wi-Fi icon followed by "LTD Broadband") and the phone number "507-369-6669". Below the header is a navigation bar with links for "PLANS", "SITE SURVEY", "ABOUT US", and "CONTACT US". The main content area has a dark background. On the left, there's a "Pricing:" section with three tables for different plan options: 3 mbps download / 0.5 mbps upload, 6 mbps download / 1 meg upload, and 10 mbps download / 2 meg upload. Each table lists monthly rates for 3, 6, and 12 months. On the right, there's a "Get in Touch" sidebar with the company name, phone number, and email address. At the bottom, there's a footer with links to "Home", "Plans", "Site Survey", "About Us", and "Contact Us", along with copyright information and a Wi-Fi icon.

Pricing:

3 mbps download / 0.5 mbps upload
\$105 for 3 months (works out to \$35/mo)
\$198 for 6 months (works out to \$33/mo)
\$360 for 12 months (works out to \$30/mo)

6 mbps download / 1 meg upload
\$165 for 3 months (works out to \$55/mo)
\$318 for 6 months (works out to \$53/mo)
\$600 for 12 months (works out to \$50/mo)

10 mbps download / 2 meg upload
\$225 for 3 months (works out to \$75/mo)
\$438 for 6 months (works out to \$73/mo)
\$840 for 12 months (works out to \$70/mo)

Get in Touch

LTD Broadband
Phone: 507-369-6669
Email: ltdbroadband@gmail.com

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A phone call was placed to LTD regarding their ability to provide service to Kossuth County. The response was they "don't presently serve this area".

LTD Broadband is not certificated in Iowa to provide local exchange service per inquiry of the Iowa Utilities Board.

 Iowa Utilities Board

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Company Search Results

16 Results Found [\(B\)ack to Search](#)

Search Criteria: **Company Name:** I **State / Province:** IA - Iowa **Industry Type:** Telephone
 Page 1 of 1

Company Name	Industry Type	Status	Inactive Date
Summary LH Telecom, Inc.	Telephone	Active	
Summary LISCO Corporation	Telephone	Active	
Summary La Motte Telephone Company	Telephone	Active	
Summary La Porte City Long Distance	Telephone	Active	
Summary La Porte City Telephone Company	Telephone	Active	
Summary Laurens Municipal Broadband Communications Utility	Telephone	Active	
Summary Lehigh Valley Cooperative Telephone Association	Telephone	Active	
Summary Lenox Municipal Communications Utilities	Telephone	Active	
Summary Liberty Communications	Telephone	Active	
Summary Link Communications, Inc.	Telephone	Inactive	01/16/2007
Summary Local Long Distance, L.C.	Telephone	Active	
Summary Lone Rock Cooperative Telephone Company	Telephone	Active	
Summary Long Lines Metro, Inc.	Telephone	Active	
Summary Lost Nation Elwood Telephone Company	Telephone	Active	
Summary Louisa Communications, L.C.	Telephone	Active	
Summary Lynnville Telephone Company	Telephone	Active	

Page 1 of 1

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LTD Broadband is not is not certificated in Iowa to provide local exchange service per Iowa Utility Board information.



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498 ID=Service Provider and Billed Entity Identification Number; HCL=High Cost Loop; HCM=High Cost Model; IAS=Interstate Access Support; ICLS=Interstate Common Line Support; LSS=Local Switching Support; SNA=Safety Net Additive Support; SVS=Safety Valve Support; FHCS=Frozen High Cost Support; IS=Incremental Support; ICC=Connect America Fund Intercarrier Compensation; Mobility I=Mobility Fund Phase One; CACM =Connect America Cost Model; RBE = Rural Broadband Experiments Fund.

High Cost Disbursement Data (498 ID = ALL , SAC = ALL , SAN = River Valley% , Year = 2015 , Month = ALL , State = IA)
This disbursement tool contains data from Jan 2003 through Mar 2016.

State	498 ID	Study Area Code	Study Area Name	HCL	HCM	IAS	ICLS	LSS	SNA	SVS	FHCS	IS	ICC	Mobility I	CACM	RBE	Year	Month
IA	143001966	351189	RIVER VALLEY TELECOM	\$3,966	\$0	\$0	\$12,793	\$0	\$0	\$0	\$0	\$0	\$7,560	\$0.00	\$0	\$0.00	2015	Dec
IA	143001966	351189	RIVER VALLEY TELECOM	\$3,966	\$0	\$0	\$12,793	\$0	\$0	\$0	\$0	\$0	\$7,560	\$0.00	\$0	\$0.00	2015	Nov
IA	143001966	351189	RIVER VALLEY TELECOM	\$4,023	\$0	\$0	\$12,793	\$0	\$0	\$0	\$0	\$0	\$7,560	\$0.00	\$0	\$0.00	2015	Oct
IA	143001966	351189	RIVER VALLEY TELECOM	\$3,965	\$0	\$0	\$12,793	\$0	\$0	\$0	\$0	\$0	\$7,560	\$0.00	\$0	\$0.00	2015	Sep
IA	143001966	351189	RIVER VALLEY TELECOM	\$3,965	\$0	\$0	\$12,793	\$0	\$0	\$0	\$0	\$0	\$7,560	\$0.00	\$0	\$0.00	2015	Aug
IA	143001966	351189	RIVER VALLEY TELECOM	\$4,097	\$0	\$0	\$12,793	\$0	\$0	\$0	\$0	\$0	\$7,560	\$0.00	\$0	\$0.00	2015	Jul
IA	143001966	351189	RIVER VALLEY TELECOM	\$3,938	\$0	\$0	\$13,565	\$0	\$0	\$0	\$0	\$0	\$8,472	\$0.00	\$0	\$0.00	2015	Jun
IA	143001966	351189	RIVER VALLEY TELECOM	\$3,938	\$0	\$0	\$13,565	\$0	\$0	\$0	\$0	\$0	\$8,472	\$0.00	\$0	\$0.00	2015	May
IA	143001966	351189	RIVER VALLEY TELECOM	\$3,390	\$0	\$0	\$13,565	\$0	\$0	\$0	\$0	\$0	\$8,472	\$0.00	\$0	\$0.00	2015	Apr
IA	143001966	351189	RIVER VALLEY TELECOM	\$4,122	\$0	\$0	\$13,565	\$0	\$0	\$0	\$0	\$0	\$8,472	\$0.00	\$0	\$0.00	2015	Mar
IA	143001966	351189	RIVER VALLEY TELECOM	\$4,122	\$0	\$0	\$13,565	\$0	\$0	\$0	\$0	\$0	\$8,472	\$0.00	\$0	\$0.00	2015	Feb
IA	143001966	351189	RIVER VALLEY TELECOM	\$3,934	\$0	\$0	\$13,565	\$0	\$0	\$0	\$0	\$0	\$8,472	\$0.00	\$0	\$0.00	2015	Jan

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IA	143001966	351189	RIVER VALLEY TELECOM	\$5,065	\$0	\$0	\$14,734	\$0	\$0	\$0	\$0	\$0	\$7,560	\$0.00	\$0	\$0.00	2016	Mar
IA	143001966	351189	RIVER VALLEY TELECOM	\$5,065	\$0	\$0	\$14,734	\$0	\$0	\$0	\$0	\$0	\$7,560	\$0.00	\$0	\$0.00	2016	Feb
IA	143001966	351189	RIVER VALLEY TELECOM	\$4,759	\$0	\$0	\$14,734	\$0	\$0	\$0	\$0	\$0	\$7,560	\$0.00	\$0	\$0.00	2016	Jan

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High Cost Disbursement Data (498 ID = ALL , SAC = ALL , SAN = Fenton% , Year = 2015 , Month = ALL , State = ALL)
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State	498 ID	Study Area Code	Study Area Name	HCL	HCM	IAS	ICLS	LSS	SNA	SVS	FHCS	IS	ICC	Mobility I	CACM	RBE	Year	Month
IA	143001962	351179	FENTON CO-OP TEL CO	\$1,987	\$0	\$0	\$5,950	\$0	\$1,033	\$0	\$0	\$0	\$3,779	\$0.00	\$0	\$0.00	2015	Dec
IA	143001962	351179	FENTON CO-OP TEL CO	\$1,987	\$0	\$0	\$5,950	\$0	\$1,033	\$0	\$0	\$0	\$3,779	\$0.00	\$0	\$0.00	2015	Nov
IA	143001962	351179	FENTON CO-OP TEL CO	\$2,008	\$0	\$0	\$5,950	\$0	\$1,033	\$0	\$0	\$0	\$3,779	\$0.00	\$0	\$0.00	2015	Oct
IA	143001962	351179	FENTON CO-OP TEL CO	\$1,986	\$0	\$0	\$5,950	\$0	\$1,033	\$0	\$0	\$0	\$3,779	\$0.00	\$0	\$0.00	2015	Sep
IA	143001962	351179	FENTON CO-OP TEL CO	\$1,986	\$0	\$0	\$5,950	\$0	\$1,033	\$0	\$0	\$0	\$3,779	\$0.00	\$0	\$0.00	2015	Aug
IA	143001962	351179	FENTON CO-OP TEL CO	\$2,034	\$0	\$0	\$5,950	\$0	\$1,033	\$0	\$0	\$0	\$3,779	\$0.00	\$0	\$0.00	2015	Jul
IA	143001962	351179	FENTON CO-OP TEL CO	\$1,978	\$0	\$0	\$5,850	\$0	\$1,033	\$0	\$0	\$0	\$3,530	\$0.00	\$0	\$0.00	2015	Jun
IA	143001962	351179	FENTON CO-OP TEL CO	\$1,978	\$0	\$0	\$5,850	\$0	\$1,033	\$0	\$0	\$0	\$3,530	\$0.00	\$0	\$0.00	2015	May
IA	143001962	351179	FENTON CO-OP TEL CO	\$1,777	\$0	\$0	\$5,850	\$0	\$1,033	\$0	\$0	\$0	\$3,530	\$0.00	\$0	\$0.00	2015	Apr
IA	143001962	351179	FENTON CO-OP TEL CO	\$2,045	\$0	\$0	\$5,850	\$0	\$1,033	\$0	\$0	\$0	\$3,530	\$0.00	\$0	\$0.00	2015	Mar
IA	143001962	351179	FENTON CO-OP TEL CO	\$2,045	\$0	\$0	\$5,850	\$0	\$1,033	\$0	\$0	\$0	\$3,530	\$0.00	\$0	\$0.00	2015	Feb
IA	143001962	351179	FENTON CO-OP TEL CO	\$1,975	\$0	\$0	\$5,850	\$0	\$1,033	\$0	\$0	\$0	\$3,530	\$0.00	\$0	\$0.00	2015	Jan

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This disbursement tool contains data from Jan 2003 through Mar 2016.

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IA	143001982	351179	FENTON CO-OP TEL CO	\$2,356	\$0	\$0	\$6,579	\$0	\$0	\$0	\$0	\$0	\$3,779	\$0.00	\$0	\$0.00	2016	Mar
IA	143001982	351179	FENTON CO-OP TEL CO	\$2,356	\$0	\$0	\$6,579	\$0	\$0	\$0	\$0	\$0	\$3,779	\$0.00	\$0	\$0.00	2016	Feb
IA	143001982	351179	FENTON CO-OP TEL CO	\$2,242	\$0	\$0	\$6,579	\$0	\$0	\$0	\$0	\$0	\$3,779	\$0.00	\$0	\$0.00	2016	Jan

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